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DISTRICT OF NEW JERSEY  
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Sills Cummis & Gross P.C.  
Joseph B. Shumofsky  
Linxuan Yan  
One Riverfront Plaza  
Newark, New Jersey 07102  
(973) 643-7000

Marcus Neiman Rashbaum & Pineiro LLP  
Jeffrey A. Neiman (*pro hac vice* forthcoming)  
Kathryn Meyers (*pro hac vice* forthcoming)  
Jason L. Mays (*pro hac vice* forthcoming)  
One Financial Plaza  
100 SE 3rd Ave., Suite 805  
Fort Lauderdale, Florida 33394  
(954) 462-1200

*Attorneys for Plaintiff Nina Agdal*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

NINA AGDAL,

Plaintiff,

v.

DILLON DANIS,

Defendant.

Case No.:

**DECLARATION OF JEFFREY A. NEIMAN, ESQ.**

1. I, Jeffrey A. Neiman, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

2. I am over the age of 18 and a non-party to this action.

3. I am a partner at the law firm Marcus Neiman Rashbaum & Pineiro LLP. I am admitted to practice law in the State of Florida and the District of Columbia. I am also a member of the U.S. Court of Appeals for the Eleventh Circuit, the U.S. Court of Appeals for the Ninth

Circuit, the U.S. Tax Court, the U.S. District Court for the Southern District of Florida, and the U.S. District Court for the Middle District of Florida.

4. I represent Plaintiff Nina Agdal, and I make this Declaration in support of her Motion for Temporary Restraining Order. My application for admission *pro hac vice* in connection with this matter is being filed contemporaneously.

5. **Exhibit A** to this Declaration is a true and correct copy of a post made on Defendant Dillon Danis's X account, @dillondanis, on August 20, 2023, which says: "This picture is like a nuclear bomb; the damage it would do would be irreparable."

6. **Exhibit B** to this Declaration is a true and correct copy of a post made on Defendant's X account, @dillondanis, on August 20, 2023, which says: "If I dropped this pic, it would end the fight, end his engagement, and I might even find myself in jail." The post also includes an emoji.

7. **Exhibit C** to this Declaration is a true and correct copy of a post made on Defendant's X account, @dillondanis, on August 22, 2023, which says: "if we hit 2 million on my instagram I'll drop the picture."

8. **Exhibit D** to this Declaration is a true and correct copy of a post made on Defendant's X account, @dillondanis, on August 27, 2023, which says: "I just got another absolute nuke of a pic of Nina this one might be worse than the other one wow this girl is actually wild. Logan on a man level you need to call this marriage off now."

9. **Exhibit E** to this Declaration is a true and correct copy of a post made on Defendant's X account, @dillondanis, on August 27, 2023, which says: "At this point, I might just need to release these images on a human level to save Logan from her. If you guys only know how nasty this chick really is, it's actually insane. But if I do, the fight will be called off and I'll be sued. Hard choice."


10. **Exhibit F** to this Declaration is a true and correct copy of a post made on Defendant's X account, @dillondanis, on August 28, 2023, which says: "Like this if I should schedule the pic to be posted on my walk to the ring?" The post also includes an emoji.

11. **Exhibit G** to this Declaration is a true and correct copy of a post made on Defendant's X account, @dillondanis, on September 2, 2023, which says: "These are so bad, I would definitely get sued, go to jail, and be fight would be off. But I might just say fuck it." The post also includes an emoji.

12. **Exhibit H** to this Declaration is a true and correct copy of a post made on the X account of Andrew Tate, @Cobratate, on August 20, 2023, which says: "I was trying very hard to not get involved in this. And I'm still staying out of it. But I opened my twitter inbox had a message from Dillion and hes really not lying."

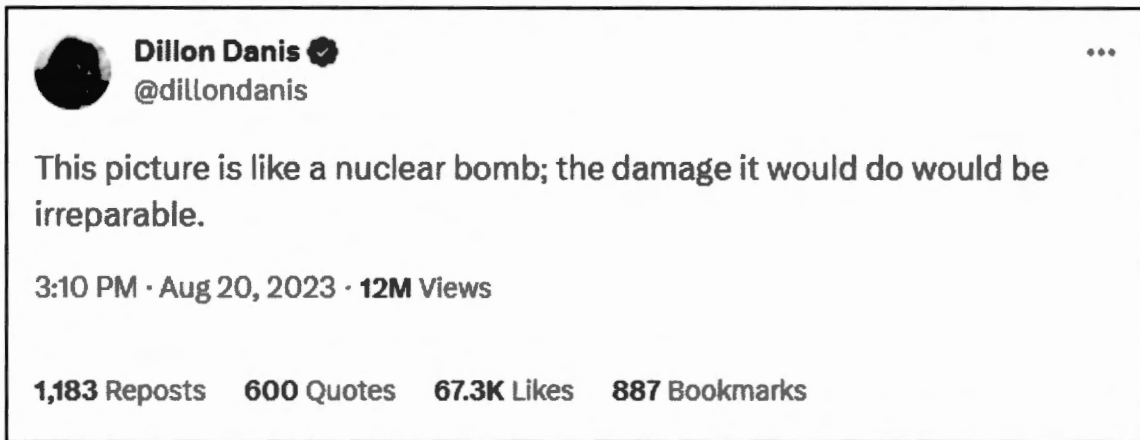
13. I declare under penalty of perjury that the foregoing is true and correct.

Dated September 6, 2023



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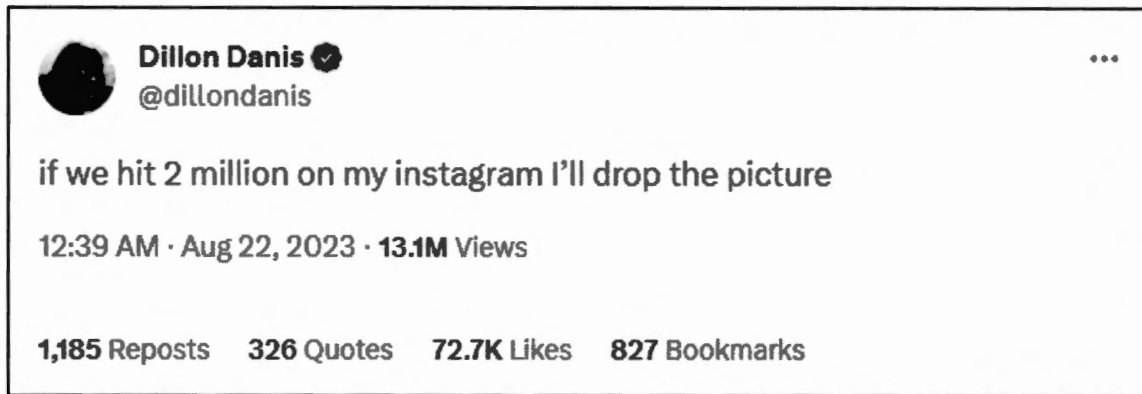
Jeffrey A. Neiman



**EXHIBIT A**



**EXHIBIT B**



**EXHIBIT C**



**Dillon Danis** ✓  
@dillondanis



I just got another absolute nuke of a pic of Nina this one might be worse than the other one wow this girl is actually wild. Logan on a man level you need to call this marriage off now.

5:04 PM · Aug 27, 2023 · **6.9M** Views

**868** Reposts   **139** Quotes   **42.3K** Likes   **555** Bookmarks

**EXHIBIT D**



**Dillon Danis** ✓  
@dillondanis

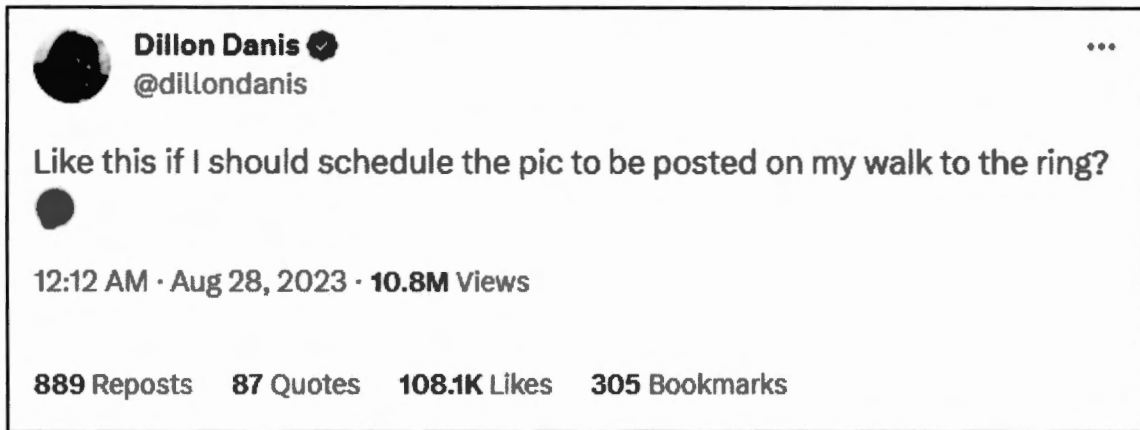


At this point, I might just need to release these images on a human level to save Logan from her. If you guys only know how nasty this chick really is, it's actually insane. But if I do, the fight will be called off and I'll be sued. Hard choice.

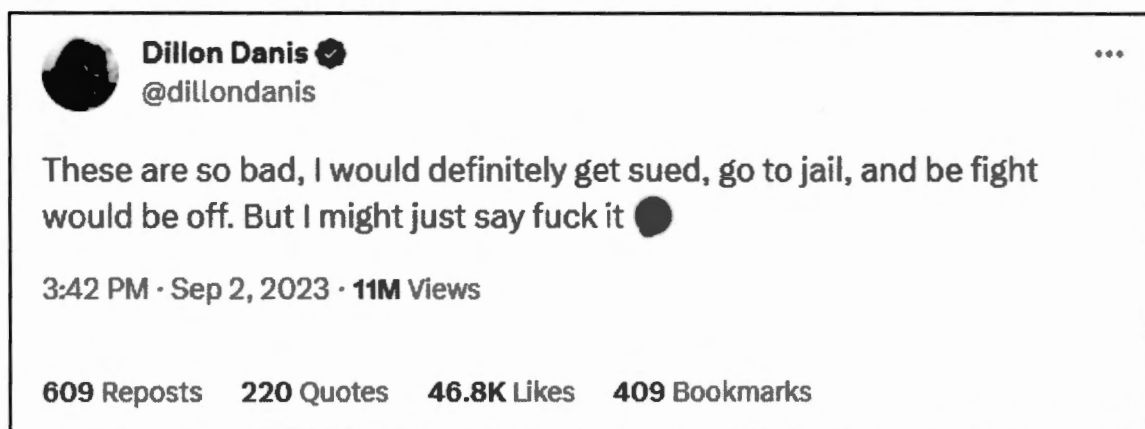
5:10 PM · Aug 27, 2023 · **14.8M** Views

**EXHIBIT E**

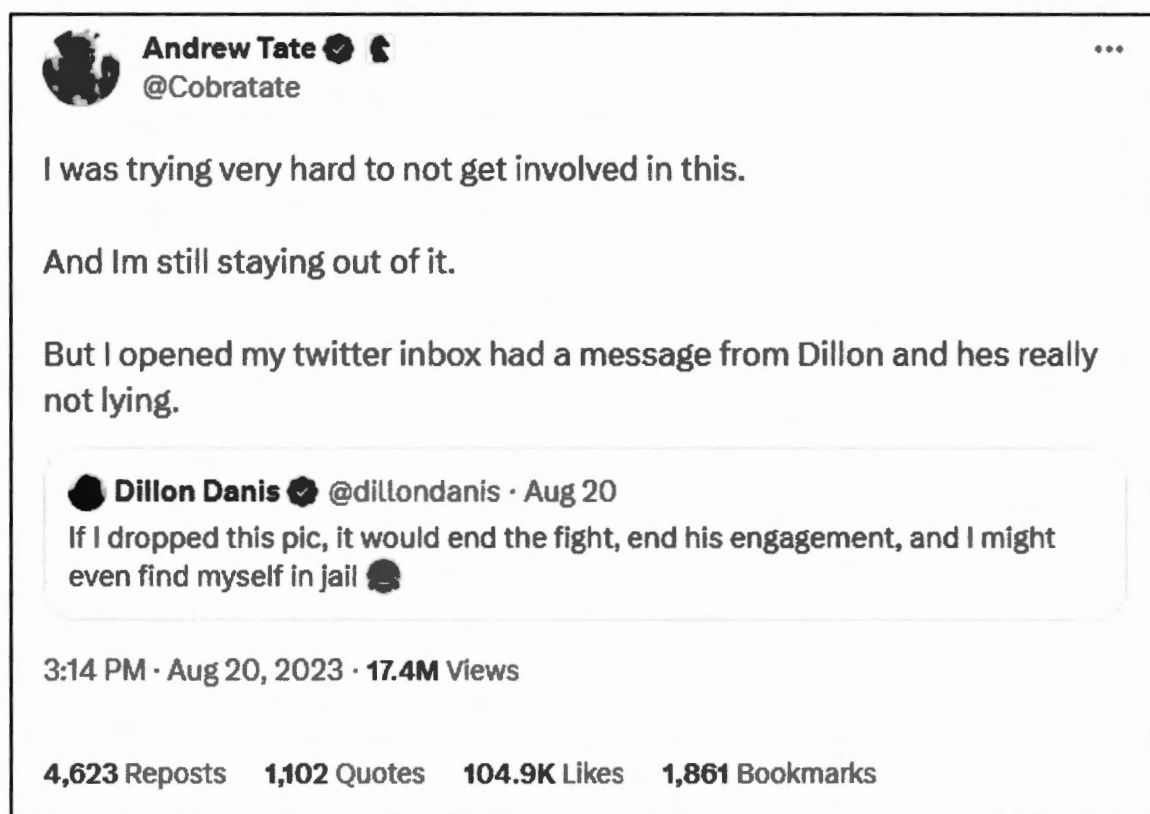




**EXHIBIT F**



**EXHIBIT G**



**EXHIBIT H**